



**Submission to Innovation, Science and Economic Development
Canada**

by

SSI Canada

In Response to SMSE-003-24

***Consultation on a Policy, Licensing and Technical Framework for
Supplemental Mobile Coverage by Satellite***

September 13, 2024

1. SSi Micro Ltd., doing business as SSi Canada ("SSi"), is pleased to submit the following initial comments to Canada's Minister of Innovation, Science and Economic Development ("ISED" or the "Department") in response to Notice No. SMSE-003-24, ***Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite*** (the "Consultation"). The Consultation was published in the *Canada Gazette, Part 1, Volume 158 No. 26*, on June 29, 2024.
2. In the Consultation, the Department proposes a policy, licensing and technical framework intended to support the expansion of mobile communications service coverage by satellite by using certain frequency bands now allocated to flexible use or commercial mobile services. The Consultation refers to this expansion of coverage as supplemental mobile coverage by satellite (SMCS).
3. SSi agrees with the Department that emerging direct-to-device (D2D) SMCS technology has potential to help close mobile wireless coverage gaps. We support ISED's policy objectives in this Consultation, especially the focus on "expand[ing] mobile services particularly in unserved and underserved areas, including rural, remote, and Indigenous communities" (Consultation, paragraph 11). The people who live and work in Canada's North deserve – and, increasingly, demand – no less than comparable service, affordability and convenience to those enjoyed by mobile customers in southern Canada.
4. To that end, we urge the Department to ensure the policy, licensing and technical framework for SMCS to permit the greatest possible flexibility for mobile wireless service operations in Canada's North – a remote area that encompasses the highest proportion of unserved, underserved, and Indigenous communities in the country.
5. We urge the Department to establish Northern service as a SMCS policy priority *in itself*. This would permit the Department to equip Northern service providers with the flexibility they need even if competing policy priorities preclude extending similar policies to operators in southern Canada.
6. Establishing service in the North as a policy priority for SMCS could entail measures such as:
 - Making use of licence subordination to encourage SMCS service provision in underserved and unserved remote areas in the North. Instead of further concentrating market share in spectrum licensees that currently hold licences for the large service areas that could be reached by SMCS, ISED should be encouraging those large incumbent licensees to subordinate their spectrum for use by operators that are willing to target unserved and underserved areas on a smaller scale.

- Enabling potential providers of Public Safety Broadband Networks (PSBN) to consider the use of D2D satellite communications to provide essential coverage to first responders and other PSBN users in the North.
7. We also note ISED's specific questions concerning the use of SMCS to enhance network reliability and resilience "based on the requirements in the MOU on Telecommunications Reliability" (question 11).
 8. Despite the fact that SSi's offers mobile service using licensed spectrum in all 25 communities in Nunavut, in the Northwest Territories, in the Yukon Territory and, through Eeyou Mobility Inc. with our Founding Shareholder partners, Eeyou Compane and Eeyou Communications Network, in all 14 Cree and Jamésien communities and along roadways in the Eeyou Istchee region of Quebec, SSi was not included in the MOU process.
 9. While a priority focus on Northern service would not necessarily address this exclusion, we suggest that it would make it more difficult to develop plans intended to address vital, fragile and underserved parts of the country without including incumbent service providers like SSi.
 10. SSi may offer more specific comments on the Consultation in our reply comments.

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